

1 **MICHAEL MEE, ESQ.**

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7 *Attorney for Plaintiff Jose DeCastro*

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 JOSE DECASTRO,

11 Plaintiff,

12 vs.

13 LAS VEGAS METROPOLITAN POLICE
14 DEPARTMENT; STATE OF NEVADA;
15 BRANDEN BOURQUE; JASON TORREY; C.
16 DINGLE; B. SORENSON; JESSE
17 SANDOVAL; OFFICER DOOLITTLE and
18 DOES 1 to 50, inclusive,

19 Defendants.

Case No.: 2:23-cv-00580-APG-EJY

**PLAINTIFF'S (FIRST) UNOPPOSED
MOTION TO EXTEND TIME FOR THE
FILING OF RESPONSE TO ECF NO. 86,
MOTION FOR SUMMARY JUDGMENT,
ECF NO. 87, MANUAL FILING, TO
JULY 8, 2024**

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21 **Certificate:** This Request is timely filed.
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MEMORANDUM OF POINTS AND AUTHORITIES

Plaintiff filed a Complaint on April 17, 2023. ECF 1. Plaintiff filed a Motion for Discovery on April 28, 2023. ECF 7. Plaintiff filed a First Amended Complaint on May 7, 2023.

Defendants filed a joint (or subsequently joined) Motion to Dismiss the First Amended Complaint on June 1, 2023. ECF 15. On June 16, 2023, Plaintiff filed a Response to Motion to Dismiss. ECF 27. On July 6, 2023, Defendants filed A Motion to Stay Discovery. ECF 32. A Reply in Support of that Motion to Dismiss was filed on June 23, 2023. ECF 30.

On July 6, 2023, an Answer to Complaint was filed by the Las Vegas Metropolitan Police Department. ECF 33.

On October 23, 2023, this Court entered an Order Granting In Part the Defendants' Motion to Dismiss. As part of that Order, the Court permitted Plaintiff to file an Amended Complaint by November 22, 2023. ECF 44. Subsequent extensions of time were granted by the Court for the filing of that Amended Complaint.

On November 27, 2023, Plaintiff filed his Second Amended Complaint. ECF 61. Defendants filed a joint Motion to Dismiss or Alternatively for Summary Judgment on December 22, 2023. A Response was filed on February 2, 2024. ECF 79. These matters remain pending.

On June 14, 2024, Defendants moved for Summary Judgment. ECF 86. This was supported by the manual filing of exhibits. ECF 87.

On July 5, 2025, the parties conferred regarding an extension of the deadline for a response to ECF 86 to July 8, 2024. Counsel for Defendants indicated no objection to this continuance via e-mail on July 5, 2025. *See* Attached Declaration of Counsel.

1 Given this brief extension is not opposed, Plaintiff respectfully asks this Court to ratify
2 said extension and grant the present unopposed motion, permitting Plaintiff to file a response to
3 ECF 86 – Motion for Summary Judgment, through **July 8, 2024.**
4

5 DATED this 5th day of July, 2024.
6

7 **/s/ Michael Mee, esq.**
8 MICHAEL MEE, ESQ.
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11 Las Vegas, Nevada 89101
12 (775) 990-0190
13 mmee@defenselawyervegas.com
14 Attorney for Plaintiff

15 **EX. A**

16 **DECLARATION OF COUNSEL**

17 MICHAEL MEE, ESQ. hereby affirms and declares as follows:

- 18 1. That I am retained counsel for the above defendant.
- 19 2. That on July 5, 2024, I conferred with counsel for the Defendants, and they agreed
20 they have no objection to the filing of a Response to their Motion for Summary Judgment through
21 July 8, 2024.

22 DATED this 5th day of July, 2024

23 **/s/ Michael Mee, Esq.**
24 MICHAEL MEE, ESQ.
25 Nevada Bar No. 13726
26

ORDER

IT IS HEREBY ORDERED that the Plaintiff's Unopposed Motion to Extend Time for the filing of a Response to ECF 86 – Motion for Summary Judgment through July 8, 2024 is HEREBY GRANTED.

Dated this ____ day of _____, 2024

UNITED STATES DISTRICT COURT JUDGE